

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	CHAPTER: 7
	)	
Sherri Lynn Brewer,	)	CASE NO: 18-10664
	)	
DEBTOR.	)	JUDGE: Janet S. Baer

**NOTICE OF TRUSTEE'S MOTION FOR FINAL EXTENSION OF TIME TO  
OBJECT TO DISCHARGE**

**PLEASE TAKE NOTICE** that on **Friday, January 4, 2019**, at the hour of **11:00 A.M.**, we shall appear before the **Honorable Janet S. Baer, U.S. Bankruptcy Judge, in Courtroom 240** of the **Kane County Courthouse, 100 S. Third Street, Geneva, Illinois**, or any other judge sitting in her place and stead, and then and there present the *Trustee's Motion (Final) to Extend Time to Object to Discharge*, a copy of which is hereby served upon you.

***AT WHICH TIME AND PLACE YOU MAY APPEAR AND BE HEARD***

Thomas E. Springer  
SPRINGER BROWN, LLC  
Wheaton Office Center  
300 South County Farm Road, Suite I  
Wheaton, IL 60187  
(630) 510-0000

/s/ Thomas E. Springer /s/

**CERTIFICATE OF SERVICE**

I, Thomas E. Springer, an attorney, on oath state that I caused to be served this Notice, Motion and proposed Order via electronic service to all parties entitled to receive same in this case through the Electronic Case Filing System (CM/ECF) and by mailing and/or electronically serving where available a copy to all parties shown and depositing same in the U.S. Mail at 300 S. County Farm Road, Wheaton Illinois before 5:45 p.m. on December 17, 2018 with proper postage prepaid.

/s/ Thomas E. Springer

**SERVICE LIST**

**VIA ECF SERVICE**

U.S. Trustee  
Patrick S. Layng  
Office of the U.S. Trustee, Region 11  
219 S. Dearborn Street  
Room 873  
Chicago, IL 60604

UpRight Law  
79 W. Monroe  
5th Floor  
Chicago, IL 60603

**VIA REGULAR MAIL**

Sherri Lynn Brewer  
47 W 110 Elathorpe Road  
Hampshire, IL 60140

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Sherri Lynn Brewer,	)	CASE NO: 18-10664
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**TRUSTEE'S MOTION FOR FINAL EXTENSION OF TIME TO OBJECT TO  
DISCHARGE**

NOW COMES Thomas E. Springer, Trustee, (herein the "Trustee") and in support of his Motion herein, respectfully represents as follows:

1. This case is currently pending under Chapter 7 of the U.S. Bankruptcy Code as filed on April 12, 2018, and Trustee is the duly appointed and qualified Trustee herein.
2. The Trustee appeared to examine the Debtor on May 14, 2018, the date first set for the Section 341 Meeting of Creditors. Present were Debtor and Debtor's counsel. The 341 was continued to multiple dates for receipt of documents requested by Trustee.
3. Based on the Debtor's sworn testimony at the §341 meeting, the Trustee requested certain documents identifying and confirming Debtor's receipt of liquidated 401k funds and subsequent transfer of monies to Debtor's mother within the twelve month period prior to the filing of the Chapter 7 petition. Additionally the Trustee directed that the Debtor's filed Statement of Financial Affairs to the Chapter 7 Petition and Schedules be amended to include the confirmation of any such transfer.
4. Debtor has complied in part with the document and information turnover directive by the Trustee. However, Debtor has not provided all information and documentation requested by the Trustee. Trustee is awaiting requested response his directive to provide contact information for the recipient transferee of the funds. Additionally, the amended Schedules as directed have not been filed to date.

5. Counsel from the Debtor's law firm that was handling the case has informed the Trustee that he recently left that law firm. Another attorney has apparently been assigned to this Chapter 7 Debtor's case in that firm.

6. As a result of the Debtor's failure to provide adequate and required documentation and amendments, the Trustee has been unable to complete his examination of the Debtor and the Bankruptcy Estate pursuant to 11 U.S.C. §704 and is unable to finalize administration and reporting of the case to the Court and to the U.S. Trustee.

7. The Trustee would prefer to avoid filing an Objection to Debtor's Discharge under 11 U.S.C. §727, and in light of the recent change of Debtor's handling counsel, is requesting the Court extend Trustee's time within to Object to Discharge by 60 days from hearing on this motion to and including March 4, 2019.

WHEREFORE Trustee prays for entry of an order extending for 60 days from the date of hearing of this motion, the date by which Trustee may object to Debtor's Discharge to and including March 4, 2019; and for any and additional equitable relief that is deemed just and appropriate by this Court.

Respectfully submitted:  
Thomas E. Springer, Trustee

/s/ Thomas E. Springer /s/

By: \_\_\_\_\_  
One of his attorneys

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